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REMARKS

The Examiner noting claim 40 is not included in the claim grouping pursuant to 37 C.F.R. §1.192(c)(7) for the purposes of the appeal. Claim 40 was inadvertently excluded in the grouping of claims 1-5, 25-31, 41-42 and 50 as standing or falling together. There is no objection to treat claim 40 being treated as standing or falling together for the appeal with the grouping of claims 1-5, 25-31, 41-42 and 50.

Appellant's representative reiterates neither Goh (U.S. 5,678,015) nor Horvitz *et al.* (U.S. 5,880,733) teaches, suggests, motivates and/or discloses accepting an event from the input device and displaying a first window having first information of a first type, the first information being related to the event and a second window having second information of a second type, the second information being related to the event.

I. Rejection of Claims 1-5, 25-31, 39-42 and 50 Under U.S.C. §103(a)

As noted in appellant's Appeal Brief, Goh does not teach, suggest or motivate *accepting an event* from the user input device and displaying a first window *having first information of a first type, the first information being related to the event* and a second window having *second information of a second type, the second information being related to the event*, as recited in independent claims 1, 25, 31, 41 and 50. Contrary to the subject claimed invention, Goh merely teaches employing one or more four-dimensional graphical user interfaces (GUI) to increase effective area of a workspace in order to view more icons or applications. (*See* col. 1, lines 9-11, col. 2, lines 29-30, and col. 6, lines 43-47).

In his Answer to Appellants' Brief, the Examiner continues to assert that Goh meets the limitation of "'a first window displaying first information of a first type,' 'a second window displaying second information of a second type,' and the first and the second information 'being related to the input event of the input device.'" (page 4 of Answer). The Examiner states "Figure 6 shows the simultaneous displaying of windows on faces of a cube responsive to a user input event" and "Each window displays different information related to the input event." (page 3 of Answer). Furthermore, the Examiner's Answer recites "An event is an action or occurrence, often generated by the user, to which a program might respond." Applicants respectfully disagree with Examiner. No

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where in Goh is there first information in a first window and second information in a second window in which *the first and second information is related to the same event*. In fact, the Examiner *incorrectly states* that the limitation is “the first and second information being related to the *input event* of the input device.” (page 4 of Answer) (emphasis added). The Examiner confuses an input from the input device as an event – yet an event and an input are separate and distinct in regards such elements as claimed and described in appellant’s subject claimed invention.

[i]t is black letter law that a patentee can choose to be his or her own lexicographer by clearly setting forth an explicit definition for a claim term... *The specification acts as a dictionary when it expressly defines terms used in the claims* or when it defines terms by implication. Where the patentee has clearly defined a claim term, that definition usually is dispositive; it is the single best guide to the meaning of a disputed term. *Guttmann, Inc. v. Kopykake Enters.*, 302 F.3d 1352 (Fed. Cir. 2002) (citations omitted) (emphasis added):

Throughout the subject specification, the term “event” is consistently defined and used in relation to a special occasion or activity (e.g., a trip and/or vacation). (See specification p. 32, lines 13-16, p. 39, lines 23-26, p. 49, lines 5-8, p. 25-30 and p. 62, lines 11-23). For example, an event can be “visit Aunt Betty, see autumn foliage, see Redskins game, visit an aquarium, and see the Statue of Liberty.” (See specification p. 32, lines 13-16). Thus, a key press, button click, or mouse click cannot be an event accepted by the input device as defined by the subject specification.

Assuming arguendo that the key press, button click, or mouse click is within the definition of an event as defined in the subject specification, *the first and second information would not be relating to the same event*. The Examiner argues the key press, button click, or mouse click would be an event from the user input device that the first window displaying first information of a first type, and the second window displaying information of a second type would relate to. According to the Examiner’s interpretation of Goh, each window displaying information would require an event such as an individual key press, button click, or mouse click in order to present the information. However with this interpretation of Goh, the first and second information *would not be relating to the same event*. Although the event, according to the Examiner, would be a key press, button click, or mouse click, *it would not be the same* key press, button click or mouse click that the first and second information would be relating. Independent claims 1, 25, 31, 41 and 50 state “accepting an

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event,” “the first information being *relating to the event*,” and “the second information being *related to the event*.” The antecedent basis of event demonstrates the event being the same throughout the claim and not a multiple event as argued by the Examiner.

Hence, Goh fails to teach, suggest or motivate all the claim limitations of the subject application. In view of at least the foregoing reasons, reversal of the rejection is respectfully requested.

II. Rejection of claims 1, 2, 5 and 50 Under U.S.C. §102(a)

As noted *supra*, independent claims 1 and 50 recite accepting an event and/or displaying a first window having first information of a first type, the first information being related to the event and a second window having second information of a second type, the second information being related to the event. Horvitz *et al.* does not teach or suggest accepting an event and then generating a multi-dimensional view of the event wherein different types of event-related information are depicted in different windows, as recited in the subject claims. Instead, Horvitz, *et al.* provides a three-dimensional virtual workspace for a window based display system. (Col. 3, lines 3-5). In Horvitz, *et al.*, a user can activate / deactivate the transformation of a two-dimensional window to a three-dimensional perspective. (See Abstract). When activated, two-dimensional windows appear in three-dimensional space by performing a geometrical transformation that suitably orients and positions the two-dimensional windows in a three-dimensional isomeric space to convey the impression that the windows are three-dimensional. (See col. 3, lines 11-21).

Moreover, the Examiner confuses the input of the input device as an event – *yet an event and an input of the input device are separate and distinct* in regards to the definition used within subject invention. Throughout the subject specification, the term “event” is consistently defined and used in relation to a special occasion or activity (e.g., a trip and/or vacation). (See specification p. 32, lines 13-16, p. 39, lines 23-26, p. 49, lines 5-8, p. 25-30 and p. 62, lines 11-23). Thus, a key press, button click, or mouse click cannot be an event accepted by the input device as defined by the subject specification. The Examiner insists a key press, or a button click, or a mouse movement from the user input device qualifies as an event defined within the subject specification. However, even if the

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definition of event incorporated key presses, button clicks, and/or mouse movements there are multiple events rather than the *same event* to which the first and second information relate.

Hence, Horvitz *et al.* does not teach or suggest a connection or relationship between the information in the windows and an event as in the claimed invention. In view of at least the foregoing reasons, reversal of the rejection is respectfully requested.

CONCLUSION

For at least the above reasons, the claims currently under consideration are believed to be patentable over the cited reference. Accordingly, it is respectfully requested that the rejections of claims 1-5, 25-31, 39-42 and 50 be reversed.

If any additional fees are due in connection with this document, the Commissioner if authorized to charge those fees to Deposit Account No. 50-1063.

Respectfully submitted,

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